REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended no claims. Applicant respectfully submits no new matter has been added. Accordingly, claims 1-19 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 1-14 and 19 stand rejected under 35 U.S.C. § 103(a) as obvious over WO 02/011467 to Jones et al (hereinafter "Jones") in view of US Pat Pub No. 2003/0051041 to Kalavade et al (hereinafter "Kalavade") and the Liberty Alliance Project (LAP) Specifications documents published July 11, 2002 (entitled "Liberty Alliance Overview" and "Liberty Bindings and profiles Specification"). The Applicant respectfully traverses the rejection of these claims.

To begin with, "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." In re Mills, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) The Applicant has reviewed the rejection and the support for combining the prior art in order to provide support for the rejection of these claims. The Applicant respectfully disagrees with the Examiner's reasoning.

As previously stated, the Applicant, in claim 1, claims a telecommunications system arranged for providing Single Sign-On (SSO) services for a user roaming in a packet radio network. A visited Gateway GPRS Support Node (V-GGSN) assigned for the user roaming in a visited packet radio is claimed. The V-GGSN sends user's identifiers relevant for the user's authentication towards the user's home network. The Detailed Action indicates that the visited Serving GPRS Node (SGSN), as disclosed by Jones with reference to Fig. 1 and 4, connected to a Roaming RADIUS Server 37 (a V-AAA in our application) and to a Home RADIUS Server 34 (a H-AAA in our application), is the equal of the Applicant's V-GGSN. However, those skilled in the art know that a GGSN and an SGSN are different.

First, the Applicant's V-GGSN is not connected with the H-AAA (cited as being equivalent to the Home RADIUS Server in Jones). Second, a GGSN entity, visited or home, is not a SGSN entity. For instance, 3GPP TS 23.060 v.5.3.0 (year 2002) states in chapter 5.4 with reference to the architecture shown in fig. 2: "The GPRS Core Network functionality is logically implemented on two network nodes, the Serving GPRS Support Node and the Gateway GPRS Support Node".

Moreover, the end of chapter 4 teaches: "In order to use GPRS services, an MS shall first make its presence known to the network by performing a GPRS attach. This makes the MS available for SMS over GPRS, paging via the SGSN, and notification of incoming packet data. In order to send and receive packet data by means of GPRS services, the MS shall activate the Packet Data Protocol context that it wants to use. This operation makes the MS known in the corresponding GGSN, and interworking with data networks can commence".

Further in chapter 5.4.1, the following is stated, "The Gateway GPRS Support Node (GGSN) is the node that is accessed by the packet data network due to the evaluation of the PDP address." A little further along, The Serving GPRS Support Node (SGSN) is the node that is serving the MS. The SGSN supports GPRS for A/Gb mode (i.e. the Gb interface is supported by the SGSN) and/or lu-mode (i.e. the lu interface is supported by the SGSN)." Then, "The SGSN and the GGSN functionalities may be combined in the same physical node, or they may reside in different physical nodes." Thus, the TS notes that the functions are different even though they may be in the same physical node.

Jones does not disclose a GGSN so it is not possible to provide a V-GGSN that has been assigned for the user at a visited packet radio network where the user is roaming. The V-GGSN of the Applicant's invention sends the user's identifiers that are relevant for the user's authentication towards the user's home network. Although Jones discloses a Home RADIUS Server for authenticating a user with user identifier and password, Jones fails to disclose a H-AAA that maintains a master session for the user with the user's identifiers. In fact, there is no suggestion in Jones of any further involvement of authenticating device other than the punctual participation on

authenticating the user. Jones does not maintain resources while the user accesses other networks via SSO authentication. Again, as lacking any motivation for SSO, Jones fails to provide a H-AAA for maintaining a master session for the user with the user's identifiers. Jones fails to provide a H-AAA for maintaining a master session for a user with the user's identifiers in the home network.

This 'master' session can only be understood as contrasting with a sort of 'slave' or 'associated' session in the V-AAA, wherein the binding of the H-AAA address and user's identifier takes place. Consequently, the above combination of prior art cannot be read as anticipating the H-AAA maintaining a master session for the user and the V-AAA acting as a proxy between the V-GGSN and the H-AAA, and binding an H-AAA address with said user's identifiers.

In summary Jones does not disclose a system comprising: a V-GGSN assigned for the user at a visited packet radio network wherein the user is roaming, the V-GGSN sending user's identifiers relevant for the user's authentication towards the user's home network; a H-AAA maintaining a master session for the user with said user's identifiers; and a V-AAA acting as a proxy between the V-GGSN and the H-AAA, and binding an H-AAA address with said user's identifiers.

Kalavade does not teach a V-GGSN connected to the Hotspot AAA server, and the information provided by Kalavade about the Hotspot AAA server is not applicable at all to the communication between a GGSN and an AAA. Moreover, the communication between the Hotspot AAA server and the CBG, even if making use of a RADIUS protocol, is not the same as the one required to communicate a V-AAA and a H-AAA, each one connectable with a corresponding GGSN, thus fitting GPRS related data.

Therefore, one has to necessarily conclude that, even if Kalavade discloses a AAA in a WLAN network connected with a common authentication and billing gateway of the home network, this teaching is not directly combinable with Jones to arrive at the features of the present invention. As a matter of fact, both Jones and Kalavade fail to teach a V-GGSN connected with a H-AAA through a V-AAA and there is no teaching on how a roaming scenario may be provided.

The Applicant respectfully submits that a combination of Jones and the Kalavade references does not produce the recited limitations. The Applicant believes that a skilled person would be in doubt where the GGSN missing in Jones could be located; in the visited or in the home network. Nothing in Jones or Kalavade teaches or suggests interposing a V-AAA to act as a proxy between the V-GGSN and the H-AAA as claim 1 in the present application recites.

Regarding the Liberty Alliance Project (LAP) reference used for support in rejecting "the federation providing a specific Uniform Resource Identifier (URI)...", the Applicant respectfully notes the importance of the specificity requirement of 37 C.F.R. § 1.104(c) which is evident in M.P.E.P. § 706.07, which states: "The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed, if possible, before appeal."

A clear issue cannot be developed between Applicant and the Examiner where the basis for the Examiner's rejection of the claims is ambiguous. The Examiner's analysis provides little insight as to (i) how the Examiner is interpreting the elements of the claims and (ii) what specific features within the LAP project the Examiner believes identically discloses the specific elements (and interactions between elements) recited in the claims. The Examiner simply cites pages 11-22 and 30-32 and states that redirection means, receiving means, etc., of claim 1 are examples of SSO processes described in those pages

By failing to specifically identify those features within the reference being relied upon in the rejection, the Examiner has essentially forced the Applicant to engage in mind reading and/or guessing to determine how the Examiner is interpreting the elements of the claims and what specific features within the reference the Examiner believes identically disclose the claimed invention.

In effect, the Examiner is placing the burden on the Applicant to establish that the reference does not disclose the claimed elements based upon the Applicant's interpretation of the claims and the Applicant's comparison of the claims with the applied prior art. Applicant also notes that any continuing disagreement between Applicant and

the Examiner as to whether or not a particular claimed feature is disclosed by the reference is a direct result of a lack of specificity by the Examiner in the statement of the rejection.

That said, the Applicant respectfully disagrees with the Examiner's interpretation of the Jones and Kalavade references. The Applicant submits that the combination of Jones and Kalavade, as stated above, do not teach interposing a V-AAA to act as a proxy between the V-GGSN and the H-AAA and neither does the LAP reference, whether the references are considered individually or in combination.

The Applicant respectfully submits that the cited references do not disclose individually or in combinations the limitations recited in claims 1 and 10. This being the case, the Applicant respectfully requests the allowance of claims 1 and 10 and since the depending claims contain the same limitations, the Applicant requests the allowance of dependent claims 2-9, 11-14 and 19.

Claims 15-18 stand rejected under 35 U.S.C. § 103(a) as obvious over Jones, Kalavade and the LAP specifications documents as applied to claims 1-14 above, and further in view of US Patent 6,578,085 to Khalil et al (hereinafter "Khalil"). The Applicant respectfully traverses the rejection of these claims.

The Applicant submits that the Khalil reference, cited for tracking IP addresses assigned to a mobile node where the IP addresses are assigned by a number of foreign networks fails to disclose the missing limitations in Jones and Kalavade as noted above.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations (MPEP 2143).

In that regard, the Applicant respectfully submits that the Examiner's four references still fail to teach or suggest each and every element of the presently pending independent claims. Claims 15-18 depend from claim 10 and recite further limitations in
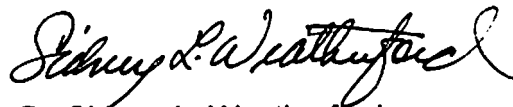
combination with the novel elements of claim 10. Therefore, the allowance of claims 15-18 is respectfully requested.

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CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

By Sidney L. Weatherford
Registration No. 45,602

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Ericsson Inc.
6300 Legacy Drive, M/S EVR 1-C-11
Plano, Texas 75024

(972) 583-8656
sidney.weatherford@ericsson.com